

### **R E M A R K S**

Reconsideration of this application, as amended, is respectfully requested.

### **THE CLAIMS**

Independent claims 1 and 17 have been amended to clarify that the colorless ink does not substantially contain a color material, as supported by the disclosure in the specification at page 5, lines 17-19.

In addition, independent claims 1 and 17 have been amended to avoid the term "preferentially" and to more positively recite instead that the jetted position of the colorless ink in each unit block is determined as a position that is not adjacent to a jetted position of the recording ink in each unit block, when the position that is not adjacent to the jetted position of the recording ink in each said unit block exists.

No new matter has been added, and it is respectfully requested that the amendments to the claims be approved and entered.

### **THE PRIOR ART REJECTION**

Claims 1, 4, 17, 20 and 35-38 were rejected under 35 USC 103 as being obvious in view of the combination of JP 2002-307755 ("Takabayashi et al"), US 2002/0163551 ("Bruch et al") and

USP 6,084,604 ("Moriyama et al"). In addition, claims 1, 4, 9, 11-13, 17, 20, 25, 27-29, 33 and 34 were rejected under 35 USC 103 as being obvious in view of the combination of USP 6,877,850 ("Ishimoto et al"), Bruch et al and Moriyama et al. And all of the remaining pending claims were rejected under 35 USC 103 as being obvious in view of various combinations of Takabayashi et al and Ishimoto et al with one or more of Bruch et al, Moriyama et al, US 2001/0015745 ("Onishi et al"), US 2001/0017642 ("Shigemura"), and WO 03/024723 ("Kida et al"). These rejections, however, are respectfully traversed with respect to the claims as amended hereinabove.

According to the present invention as recited in clarified amended independent claims 1 and 17, recording ink containing a color material and colorless ink for improving gloss that does not substantially contain a color material are jetted onto a recording medium by recording heads to perform image formation according to image data. Significantly, as recited in clarified amended independent claims 1 and 17, a jetted position of the colorless ink in each unit block is determined as a position that is not adjacent to a jetted position of the recording ink in each unit block, when the position that is not adjacent to the jetted position of the recording ink in each unit block exists.

With the method and structure of the present invention as recited in clarified amended independent claims 1 and 17, because

the colorless ink (which does not substantially contain a color material) can be arranged preferentially in a position that is not adjacent to the jetted position of the recording ink in each unit block (i.e., "when the position that is not adjacent to the jetted position of the recording ink in each said unit block exists"), the gloss of an image can be improved. Namely, the colorless ink can be prevented from contacting the recording ink, thereby rendering it possible to prevent bleeding of the recording ink and blurring of the recorded image, and the image imprinted on the recording medium does not look uneven in terms of glossiness.

On pages 4 and 8 of the Office Action, the Examiner cites Fig. 26 of Moriyama et al as disclosing the feature of the present invention as formerly recited in independent claims 1 and 17 whereby the jetted position of the colorless ink in each unit block is determined preferentially as a position that is not adjacent to a jetted position of the recording ink in each unit block.

Fig. 26 of Moriyama et al show three kinds of dots. Reference numeral 402 denotes dots of a color image - namely, cyan (C), magenta (M) and yellow (Y) ink. Reference numeral 401 denotes dots of only black ink. And reference numeral 400 denotes black dots obtained by mixing the color inks. As shown in Fig. 26 of Moriyama et al, the black dots 401 are arranged so as not to be adjacent to dots 402 of a color image, and the black

dots 400 obtained by mixing the color inks are arranged so as to be adjacent to dots 402 of a color image.

It is respectfully pointed out, however, that in Moriyama et al the black dots adjacent to color image dots 402 are formed by black dots 400 obtained by mixing the color inks, and the black dots apart from (i.e., not adjacent to) the color image dots 402 are formed by black dots 401 of the black ink alone. Therefore, according to Moriyama et al, since the color tone of a black image changes stepwise, a boundary between the two kinds of black images does not become conspicuous. See column 17, lines 11-51 of Moriyama et al.

It is respectfully submitted that the "black ink" as disclosed in Moriyama et al does not correspond to "colorless ink for improving gloss that does not substantially contain a color material" as according to the present invention as recited in clarified amended independent claims 1 and 17, and it is respectfully submitted that Moriyama et al does not at all disclose or suggest using colorless ink as according to the claimed present invention.

According to the present invention as recited in clarified amended independent claims 1 and 17, the jetted position of a colorless ink for improving gloss that does not substantially contain a color material is determined as a position that is not adjacent to a jetted position of the recording ink in each unit

block, when the position that is not adjacent to the jetted position of the recording ink in each said unit block exists. And it is respectfully submitted that Moriyama et al clearly does not at all disclose or suggest this feature of the present invention as recited in clarified amended independent claims 1 and 17. In addition, it is respectfully submitted that the structure and method of Moriyama et al cannot achieve the advantageous effect achieved by the method and structure of the present invention as recited in clarified amended independent claims 1 and 17 whereby the gloss of an image is improved.

Still further, it is respectfully submitted that the other cited references also do not disclose or suggest the above described feature of the present invention as recited in clarified amended independent claims 1 and 17 whereby the jetted position of a colorless ink in each unit block is determined as a position that is not adjacent to the jetted position of the recording ink in each unit block, when the position that is not adjacent to the jetted position of the recording ink in each unit block exists.

Accordingly, it is respectfully submitted that even if Moriyama et al were combinable with the other cited references in the manner suggested by the Examiner, any such combination still would not achieve or render obvious the above described feature

and effect of the present invention as recited in clarified amended independent claims 1 and 17.

In view of the foregoing, it is respectfully submitted that amended independent claims 1 and 17, and all of the claims respectively depending therefrom, clearly patentably distinguish over the cited references, taken singly or in any combination consistent with the respective fair teachings thereof, under 35 USC 103.

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Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

/Douglas Holtz/

Douglas Holtz  
Reg. No. 33,902

Frishauf, Holtz, Goodman & Chick, P.C.  
220 Fifth Avenue - 16<sup>th</sup> Floor  
New York, New York 10001-7708  
Tel. No. (212) 319-4900

DH:bl  
encs.